



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

**75 Hawthorne Street
San Francisco, CA 94105-3901**

June 9, 2009

John Pelka
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

Subject: Presidio Trust Management Plan Main Post Update Supplement to a Draft Supplemental Environmental Impact Statement (SDSEIS), San Francisco, California [CEQ #20080227]

Dear Mr. Pelka:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's (CEQ) NEPA Implementation Regulations at 40 CFR 1500-1508, and our NEPA review authority under Section 309 of the Clean Air Act.

We have rated the SDSEIS as EC-2 – Environmental Concerns - Insufficient Information (see enclosed "Summary of Rating Definitions"). In October 2008, EPA reviewed the Main Post Update DSEIS and expressed a lack of objections to the preferred alternative. Since then, the Presidio Trust has produced the SDSEIS, which updates the DSEIS to take into account several additional proposals that had not been fully contemplated in the DSEIS; and the National Park Service has released its April 6, 2009 Section 213 Report, which was prepared for the Advisory Council on Historic Preservation. The Section 213 Report indicates that the cumulative effects of the proposed project, together with previously approved projects in the Main Post and adjacent area, "will seriously threaten the integrity of the Main Post, the historic core of the National Historic Landmark District, to a degree that cannot be mitigated to an acceptable level, which would significantly diminish the integrity of the Presidio of San Francisco National Historic District" and that revisions to the preferred alternative may be needed to minimize or avoid such adverse effect. Although historic preservation is not EPA's area of expertise, we are concerned that, because the Section 213 Report was not available when the SDSEIS was produced, the SDSEIS does not fully address the cumulative effects of the proposed project on historic resources. In addition, we have some concerns regarding air quality matters that should be addressed in the Final EIS.

EPA understands that the Presidio Trust is working with the Advisory Council on Historic Preservation, State Historic Preservation Officer, National Park Service, and several consulting and concurring parties to develop a programmatic agreement (PA) to avoid, minimize, or mitigate adverse effects of the project on the National Historic Landmark District. This process may result in further changes to the proposed project. Furthermore, it appears that much of the information that should be included in the Final EIS will be addressed in, or determined by, the PA. For these reasons, we recommend the Final EIS not be prepared until the PA is signed, and that the PA be included as an appendix in the Final EIS. If significant revisions are made to the preferred alternative that have not been evaluated in the current SDSEIS, the Presidio Trust should consider preparing a revised Draft EIS to ensure the public has sufficient opportunity to weigh in on the new alternative(s).

With regard to air quality impacts, the SDSEIS refers to the Presidio Trust Management Plan (PTMP) EIS, which found that, based on the scale of the proposed demolition and construction activities, it is highly unlikely that the conformity applicability threshold would be exceeded by construction activities during any single year of the phased build-out. We note, however, that the current SDSEIS revises the PTMP, and the construction and demolition emissions projections for the preferred alternative are not provided in the PTMP EIS nor the SDSEIS. In our June 24, 2002 comments on the PTMP Final EIS, we recommended that the Presidio Trust revisit the conformity issue in the NEPA analyses for any future PTMP projects tiered to the PTMP EIS. The Final EIS should provide the emissions projections for construction and demolition activities under the various alternatives, including the preferred alternative.

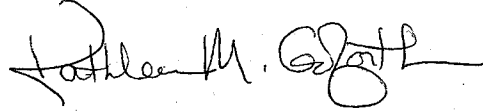
In December 2008, former EPA Administrator Stephen L. Johnson signed a Federal Register notice making final designations of which areas of the country met or did not meet the 2006 particulate matter National Ambient Air Quality Standards, or PM NAAQS. The San Francisco Bay Area was listed in that notice as a non-attainment area. Although the Federal Register notice has not been published and, therefore, no effective date is yet established for such areas, we recommend that the Presidio Trust consider measures to minimize the project's PM_{2.5} emissions, and address this in the FEIS.

The SDSEIS indicates that the Presidio Trust will continue to implement components of the existing Transportation Demand Management program or adopt more aggressive strategies. We reiterate our support for adoption of strategies that will increase shuttle and transit usage and reduce hotspot emissions of air pollutants near sensitive receptors such as school, child care facilities, and senior housing. We encourage the Presidio Trust to work with local agencies to develop and implement such strategies.

The Final EIS should also provide more detailed information on how mitigation measures will be implemented and funded. If mitigation implementation or anticipated success is questionable (e.g., because of the need for another entity to implement it or because funding is uncertain), this should be noted and discussed in the Final EIS.

We appreciate the opportunity to review this SDSEIS, and request a copy of the Final EIS when it is officially filed with our Washington, D.C., office. If you have any questions, please call me at (415) 972-3521 or Jeanne Geselbracht at (415) 972-3853.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kathleen M. Goforth', with a stylized flourish at the end.

Kathleen M. Goforth, Manager
Environmental Review Office

003518

Enclosure: "Summary of Rating Definitions"

Cc: Elaine Jackson-Retondo, National Park Service
Kathryn Kerr, Advisory Council on Historic Preservation
Wayne Donaldson, State Historic Preservation Officer

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.